

In discussions with counsel, alternatives to live witness testimony were proposed, such as video examination. Dr. Scarino has deemed this possibility as equally prohibitive to Mr. English's health.

Dr. Scarino's opinion is that written questions submitted by both parties and written answers provided therefrom is the least burdensome and therefore most tenable alternative to Mr. English's appearance. Mr. English was previously deposed by both parties during the discovery phase of this case.

It is respectfully requested that Mr. English's specific condition be disclosed to the Court in a confidential setting.

For the foregoing reasons, it is respectfully requested that the Court grant this Motion Quash the Trial Subpoena, excuse Mr. English from the subpoena or impose less burdensome alternatives.

Respectfully submitted this 6th day of June, 2018.

/s/ Hugh B. Ward, Jr.
Hugh B. Ward, Jr. (BPR No. 015071)
YOUNG, WILLIAMS & WARD, PC
300 Montvue Road
Knoxville, TN 37919
Phone: (865) 637-1440

COUNSEL FOR CHRISTOPER ENGLISH

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Hugh B. Ward, Jr.

Hugh B. Ward, Jr.